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In the manner of 1998 biennial Regulatory Review, Amendment of Part 97 of the Commission's Amateur Service Rules, FCC W.T. Docket 98-143.

l appreciate the opportunity to comment on the licensing laws for the ham radio service. I have been a ham since the early 1950's and have the Advanced ticket. I have a degree in Physics from Clemson University and worked for 35 years in the nations nuclear weapon program. In 45 years I have made possibly a half dozen CW contacts. I have viewed the code requirements as a way to keep persons out of ham radio. This was not so serious for the hobby until PC's, e-mail, and cell phones became available. These new ways of communicating which do not require some arduous/meaningless testing to get a licencse (the code), provide an attractive alternative to ham radio. The result is that the number of new hams is in a serious decline. This should tell the FCC and ARRL something, namely, a licensing process where the amount of band access is determined by code speed has outlived its usefulness, and other means must be found to qualify for use of the most sought-after bands and frequencies. What I hear is that young folks do not want to spend a lot of time on code they never expect to use. Some suggestions are:

- 1. There should be only three license categories, Technician, General, and Advanced or some such titles.
- 2. If used at all, the 5 wpm code speed should be required (because of the international agreement which should be changed at the first opportunity) only for the General license. Since higher and higher code speed ability is not evidence of increasing technical prowess, and ham radio is in a technical arena, code speed should not be an important element in the licensing process. There are other possibilities listed below (and I am sure there are many others) that can be a better measure of technical ability that could serve instead of code speed to attain a higher license, and at the same time enhance the value of the hobby to participants and to society. Other possibilities for an upgrade are:
- a. A degree in any technical field, including mathematics, from a recognized college or university.
  - b. Build a piece of electronic equipment such as an antenna tuner.
  - c. Serve as a mentor or instructor in teaching ham radio theory, rules, and

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regulations, or perform some other service of value to the ham radio community...

- d. Develop an original electronic circuit to perform some function.
- e. Take and complete a science related course in a college or Junior college.
- 3. All portions of the HF and LF bands should be available for voice/SSB communication. No portion of these bands should be set aside for cw use only. Frequency wise, no more than one-tenth of any HF or LF band should be allowed for cw use. There should be a power limitation for cw of 10 or at most 100 watts. For the future, plan for cw to disappear.

My first ham shack was a converted chicken coop, but things have changed. What I am suggesting is that ham radio is due a dynamic change that can carry it through and beyond the year 2,000. All of the licenses and tests below the General class should be combined into one, and all licenses and tests above the General class should be combined into one. What these new categories are called is of no concern to me. As for code, since speed has no relevance for science and technology and the sending and receiving of dots and dashes is an amusing antique method of communicating last used with the Titanic, the code test of the future could be to write from memory all 26 Morse Code characters for the letters of the alphabet plus the period and question mark, and get 80% correct. The design of the licensing process should be to reward technical achievement not code proficiency, and to provide an organization that hams can be proud of. What this requires is that the exams for the three categories be upgraded to have a very significant range of increasing technical difficulty, with the exam for the top license containing college level material. The code fanatics in the ARRL should not be allowed to use code speed to "protect band privileges". They are a vanishing breed and when their influence has waned the hobby will be better for it. Like cat whiskers for crystal radios, cw should be buried along with other historic relics of ham radio.

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